

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PAUL SIMKUS,)	
)	
Plaintiff,)	
)	Case No. 13-cv-4388
v.)	
)	Honorable Judge Thomas M. Durkin
UNITED AIRLINES,)	
)	Magistrate Judge Jeffrey T. Gilbert
Defendant.)	

NOTICE OF MOTION

PLEASE TAKE NOTICE that on **Thursday, February 12, 2015, at 2:00 p.m.**, or as soon thereafter as counsel may be heard, we shall appear before Judge Gilbert in Courtroom 1386 of the Federal Dirksen Building, 219 North Dearborn Street, Chicago, Illinois and then and there present **DEFENDANT'S MOTION FOR ENTRY OF A PROTECTIVE ORDER TO PRECLUDE PLAINTIFF AND HIS AGENTS FROM CONTACTING UNITED MANAGERIAL EMPLOYEES** a copy of which is attached and hereby served upon you.

Date: January 29, 2015

Respectfully submitted,

UNITED AIRLINES, INC.

By: s/Ada W. Dolph
One of Its Attorneys

Ada Dolph
Sara A. Eber
SEYFARTH SHAW LLP
131 South Dearborn Street
Suite 2400
Chicago, Illinois 60603
(312) 460-5000 (phone)
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CERTIFICATE OF SERVICE

I, Ada W. Dolph, an attorney, do hereby certify that January 29, 2015, I caused a true and correct copy of the foregoing **NOTICE OF MOTION** to be filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel and parties of record indicated below, and an additional courtesy copy will be sent to Plaintiff by U.S. mail:

Paul Simkus
38 North Belmont Ave.
Arlington Heights, IL 60004

s/Ada W. Dolph
Ada W. Dolph